

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE;  
MISSISSIPPI STATE CONFERENCE OF  
THE NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE;  
JACKSON CITY BRANCH OF THE  
NAACP; DERRICK JOHNSON; FRANK  
FIGGERS; CHARLES TAYLOR;  
MARKYEL PITTMAN; CHARLES JONES;  
and NSOMBI LAMBRIGHT-HAYNES,

*Plaintiffs,*

v.

TATE REEVES, in his official capacity  
as Governor of the State of Mississippi;  
SEAN TINDELL, in his official capacity  
as Commissioner of Public Safety; BO  
LUCKEY, in his official capacity as  
Chief of the Mississippi Department of  
Public Safety Office of Capitol Police;  
MICHAEL K. RANDOLPH, in his  
official capacity as Chief Justice of the  
Mississippi Supreme Court; and LYNN  
FITCH, in her official capacity as  
Attorney General of the State of  
Mississippi,

*Defendants.*

**Civil Action No. 3:23-cv-272-HTW-LGI**

***JXN UNDIVIDED COALITION v. TINDELL* PLAINTIFFS’  
URGENT AND NECESSITOUS MOTION FOR EXPEDITED CONSIDERATION OF  
PLAINTIFFS’ MOTION FOR CONSOLIDATION AND,  
IF GRANTED, PLAINTIFFS’ PENDING  
MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Local Rule 7(b)(8), Plaintiffs in Civil Action No. 3:23-cv-351-TSL-RPM, *Jxn Undivided Coalition, et al. v. Tindell, et al. (Coalition)*, hereby file this urgent and necessitous motion respectfully requesting expedited consideration of *Coalition* Plaintiffs' motion for consolidation of their case, filed last week in this Court, with this action. Dkt No. 48 (filed today). As noted in that motion, *Coalition* Plaintiffs filed a motion for a preliminary injunction on June 3, 2023, requesting relief from a provision of a law scheduled to go into effect on July 1, 2023. That law, S.B. 2343, makes it illegal to protest on streets or sidewalks next to any property owned or occupied by any state entity or official absent prior written permission from one of two state officials, both of whom are defendants in this case. The *Coalition* Plaintiffs' memorandum in support of their motion is attached hereto as Exhibit 1. The memorandum recounts facts, supported by four declarations, explaining why the *Coalition* Plaintiffs have been and will continue to be irreparably harmed if their motion is not granted. These declarations are attached hereto as Exhibit 2. They provide information about the *Coalition* Plaintiffs' past and future protest actions that have and will take place on sidewalks and streets by state government properties. The City of Jackson has already approved permits for certain marches they are organizing in July of 2023.

In the event their motion to consolidate is granted, the *Coalition* Plaintiffs also file this urgent and necessitous motion requesting expedited consideration of their motion for a preliminary injunction. *Coalition* Dkt. No. 6 (filed June 3, 2023).

Based on the foregoing and the exhibits attached to this motion, listed below, the *Coalition* Plaintiffs respectfully submit this urgent and necessitous motion for expedited consideration of their motion for consolidation be granted and, if consolidation is granted, that their pending motion for a preliminary injunction also be considered on an expedited basis, pursuant to Local Rule 7(b)(8).

**Exhibit 1:** *Coalition* Plaintiffs' Memorandum in Support of Motion for a Preliminary Injunction

**Exhibit 2:** Decl. of *Coalition* Plaintiff Arekia Bennett-Scott

Submitted, this 7th day of June, 2023.

/s/ Paloma Wu

Paloma Wu (Miss. Bar No. 105464)  
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